

## UNITED STATES DISTRICT COURT

for the  
Southern District of TexasUnited States Courts  
Southern District of Texas

FILED

May 18, 2022

Nathan Ochsner, Clerk of Court

United States of America  
v.  
Juan Manuel LOPEZ; YOB: 1990 (USA)

Case No. 7:22-MJ-993-1

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 17, 2022 in the county of Brooks in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

21 USC 841  
21 USC 846

## Offense Description

Conspiracy to Possess with the Intent to Distribute and Possession with the  
Intent to Distribute Cocaine, approximately 3.5 kilograms, a schedule II  
controlled substance.

This criminal complaint is based on these facts:

(See Attachment I).

☒ Continued on the attached sheet.

Approved by AUSA Patricia Profit

Submitted by reliable electronic means, sworn to and  
attested to telephonically before me on:Date: May 18, 2022 at 12:47 p.m.City and state: McAllen, Texas

/S/ Danielle Martin

Complainant's signature

Danielle Martin, DEA Special Agent

Printed name and title

Judge's signature

J. Scott Hacker, U.S. Magistrate Judge

Printed name and title

## ATTACHMENT 1

1. Throughout 2020 and 2021, Drug Enforcement Administration (DEA) Special Agents and United States Border Patrol (USBP) Agents conducted surveillance at a property known for stashing and loading narcotics in Rio Grande City, Texas. During surveillance, agents observed a white GMC Sierra bearing Texas license plate NHB4943, registered to Juan Manuel LOPEZ (hereafter, LOPEZ), parked at the aforementioned property on numerous occasions.
2. During March 2022, DEA Special Agents received information from a confidential source that LOPEZ works for a Drug Trafficking Organization (DTO) in Rio Grande City, Texas that is responsible for coordinating shipments of narcotics to northern United States cities. Agents received further information that the DTO utilizes hidden compartments, specifically near the firewall of vehicles, to smuggle the narcotics north from Rio Grande City, Texas.
3. On May 17, 2022, at approximately 9:00 a.m., the white GMC Sierra, bearing Texas license plate NHB4943, approached the USBP Falfurrias checkpoint. At the checkpoint, a USBP agent made contact with the driver of the white GMC Sierra, who was identified as LOPEZ. As the agent questioned LOPEZ, the agent observed that LOPEZ appeared very nervous, would not make eye contact, and appeared to be in a rush to depart the checkpoint. The agent further observed that during questioning, LOPEZ's vehicle was inching forward and the agent subsequently asked LOPEZ to place the vehicle in park. In addition, LOPEZ appeared to be keeping a close eye on the USBP canine walking around LOPEZ's vehicle during questioning.
4. Based on LOPEZ's behavior during questioning, the USBP agent requested consent to conduct an x-ray scan of LOPEZ's vehicle. LOPEZ voluntarily provided agents consent to conduct the scan, which subsequently revealed anomalies in the hood of the vehicle near the front windshield. A further search of LOPEZ's vehicle revealed three (3) bricks of suspected narcotics concealed under the hood of the truck in a natural void of the firewall area. LOPEZ was placed under arrest at that time.
5. On this same date, DEA agents responded to the USBP Falfurrias checkpoint to assist with the investigation. Agents attempted to conduct an interview with LOPEZ, but LOPEZ requested an attorney and the interview was concluded.
6. The three (3) bricks of suspected narcotics were field tested by USBP agents, which tested positive for characteristics of cocaine and weighed approximately 3.5 kilograms.